

LAW OFFICES OF
MICHAEL K. CHONG LLC

**2 EXECUTIVE DRIVE, SUITE 720
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676**

EMAIL: MKC5001@YAHOO.COM

MICHAEL K. CHONG ‡

‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY
SDNY, NEW YORK
EDNY, NEW YORK
U.S.C.A 2nd CIRCUIT

**NEW YORK:
1250 BROADWAY 36TH FL. STE. 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104**

**HOBOKEN:
300 HUDSON STREET. STE. 10
HOBOKEN, NEW JERSEY 07024
(201) 203-7476 FAX (201) 708-6676**

** Please Reply to: Fort Lee*

DIRECT DIAL: (201) 947-5200

July 22, 2015

Via ECF; Total Pages: 1

Honorable Steven I. Locke, U.S.M.J.
United States District Court - EDNY
100 Federal Plaza
Central Islip, NY 11722-9014

Re: Siancas v. Rallye Motors, LLC et al.
Docket No.: 2:14-CV-06151-JS-SIL

Dear Judge Locke:

This office represents Defendant Exclusive Detailing, Inc. (EDI) in regard to the above referenced matter. I am responding to Plaintiff's counsel Steven Moser, Esq.'s letter to the court dated July 21, 2015 (Document 91), concerning the deposition of my client Michael Agolia, the owner of EDI. Mr. Moser requests that the deposition should proceed on August 13, 2015. My client and I are not available on that date. By copy of this letter, I would ask Mr. Moser to contact my office so that we can schedule the deposition on a date when the parties are available.

Mr. Moser also requests that the deposition of my client, be conducted at his office in Glen Cove, Long Island. My client resides in New Jersey, and as such, I request that my clients deposition be held at my Fort Lee, New Jersey office. I would conclude that this location is also convenient for Co-Defense counsel for the Rallye defendants, as their office is in New York city. Thank you for your kind consideration and courtesies in addressing this matter.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: All counsel via ECF